

May 7, 2018

**Via ECF**

Hon. Eric N. Vitaliano  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

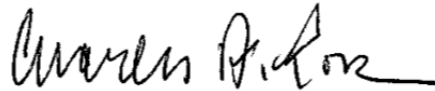
Re: U.S. v. Discala, et al., 14-CR-00399 (ENV)  
Motion for Extension of Time to File a Motion under Fed. R. Crim. Pro.  
33(b)(2)

Your Honor:

As the Court is aware, I represent Abraxas Discala in this matter. After the verdict was received in this case on May 4, 2018, I asked the Court for an extension of the time to file post-conviction motions until six weeks after the verdict was delivered, or to June 15, 2018. The Court granted that motion. I write now to make sure that my motion was understood to include an extension for a motion for a new trial under Rule 33(b)(2). As the Court is aware this is a complicated case with mountains of relevant documents. There are five weeks of trial transcripts to pore through. I write to ensure that the Court's order granting the extension of time to file post-conviction motions included a Rule 33 motion.

On behalf of Mr. Discala, I thank the Court for its consideration of this request.

Respectfully,



Charles A. Ross  
Attorney for Defendant Discala